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Attorneys for Stephen Silverman

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

United States of America, } Case No.: 18-cr-00533-RS  
Plaintiff, }  
vs. } Declaration of Counsel in Support of  
STEPHEN SILVERMAN, } Unopposed Motion for Temporary  
Defendant } Modification of Defendant Stephen  
Silverman's Conditions of Release to  
Permit Travel and Release of Passport

1 I, Marcus S. Bourassa, declare under penalty of perjury as follows:

- 2 1. I am counsel for defendant Stephen Silverman in this matter.
- 3 2. I make this declaration in support of Mr. Silverman's unopposed motion
- 4 for temporary modification of his conditions of release to permit travel
- 5 and release of passport.
- 6 3. This declaration is based on my personal knowledge and I could and
- 7 would testify to the following facts if called as a witness in this matter.
- 8 4. Defendant Stephen Silverman is on pretrial release in this case on a
- 9 \$350,000 bond.
- 10 5. Mr. Silverman has surrendered his passport to Pretrial Services and his
- 11 conditions of release prevent him from traveling internationally.
- 12 6. The Court previously approved travel to Holbox Island, Quintana Roo,
- 13 Mexico for a family vacation from September 20 to 30, 2020.
- 14 7. Mr. Silverman now hopes to travel so he may be in Zurich, Switzerland,
- 15 for work from November 22 to December 1, 2020.
- 16 8. Mr. Silverman further hopes to travel to Dominican Republic for a family
- 17 vacation from December 26, 2020 to January 9, 2021.
- 18 9. For this reason, Mr. Silverman requests a temporary modification of his
- 19 conditions of release to permit international travel to Switzerland and
- 20 Dominican Republic as set forth above.
- 21 10. Mr. Silverman further requests that his passport be temporarily returned
- 22 to him as part of the travel.
- 23 11. Mr. Silverman's supervising Pretrial Services Officer, Joslyn Harris, does
- 24 not object to these requests and has advised that Mr. Silverman has been
- 25 fully compliant with his conditions of release to date.
- 26 12. Mr. Silverman will check in with Ms. Harris prior to his departure, upon
- 27 arrival abroad, and immediately upon his return to the United States.

1       13. Mr. Silverman will also surrender his passport to Pretrial Services upon  
2       his return to the United States.

3       14. Surety Emma Murmuridis agrees to the requested modification as  
4       detailed in the acknowledgment of sureties, attached.

5       15. I have conferred with AUSA Andrew Dawson regarding this motion, and  
6       the United States does not oppose Mr. Silverman's requests.

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8       I declare the foregoing to be true and correct under penalty of perjury of the  
9       laws of the United States, this 10th day of November, 2020, in San Diego,  
10      California.

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12      *s/ Marcus S. Bourassa*  
13      **MARCUS S. BOURASSA**  
14      Attorney for Stephen Silverman